UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

SHAW-NAE DIXON, THOMAS CASATELLI, JEANETTE RIVERA, NATALIA YAKUBOVA, CHRIS KING, ALISON MARCHESE, on behalf of AM, JM, and MMV (her minor children), WILLIAM MORRIS, GEORGE KABBEZ, SHAW-NAE'S HOUSE, LLC, SALTY DOG RESTAURANT, LTD, PER TAVERN CORP. d/b/a THE KETTLE BLACK, CARGOSTORK PARTIES, INC. d/b/a DO ME A FAVOR, and INDEPENDENT RESTAURANT OWNERS ASSOCIATION RESCUE, INC.,

Civil Action No. 21-CV-5090 (BMC)

DECLARATION OF RONALD A. BERUTTI

Plaintiffs,

v.

ERIC ADAMS, in his official capacity as Mayor of the City of New York and as successor to Bill de Blasio, and THE CITY OF NEW YORK,

Defendants.

RONALD A. BERUTTI, of full age, hereby declares the following under penalty of perjury:

- I am a Member of Murray-Nolan Berutti LLC, attorneys for the plaintiffs herein. I
 am fully familiar with the facts set forth below. I make this Declaration in opposition of the Order
 to Show Cause.
 - Attached hereto as Exhibit A is a true copy of a proposed Amended Complaint.
- Attached hereto as Exhibit B is a true copy of a redlined comparison of the Complaint and the proposed Amended Complaint.

Case 1:21-cv-05090-BMC Document 40-2 Filed 05/25/22 Page 2 of 2 PageID #: 669 I hereby declare the foregoing to be true and correct based on my personal knowledge under penalty of perjury under the laws of the United States of America. Ronald A. Berutti Ronald A. Berutti Dated: May 25, 2022